



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL
LITIGATION BUREAU

Writer's Direct Dial: (212) 416-8373

June 30, 2021

VIA ECF

Honorable John G. Koeltl
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Liverpool v. City of New York, 19 Civ. 5527 (JGK)

Dear Judge Koeltl:

The New York State Office of the Attorney General ("NYAG") and the City of New York respectfully jointly write in response to the Court's June 15, 2021 Order directing them to "respond to the letter filed by the Plaintiff in ECF No 40." (ECF. No. 41).

The NYAG has been informed by New York State Department of Corrections and Community Supervision ("DOCCS") that according to their search, no parole officer matching the description given by Plaintiff was present at Shiloh Consulting ("Shiloh") on June 3, 2016. Plaintiff has twice confirmed that the person who he contends abused him, who he believed to be a parole officer, was a Black male weighing approximately 200 pounds. (ECF No. 18 at p.2 and No. 37 at p.2). DOCCS records indicate that the only parole officer who made a visit entry for Shiloh on June 3, 2016 was a Hispanic male weighing 170 pounds, who could not possibly be, or be mistaken for, the person described by Plaintiff. Furthermore, the NYAG has been informed by Shiloh that according to their logbook, no parole officer was present at Shiloh on June 3, 2016. Moreover, no male employee on Shiloh's payroll in June 2016 that somewhat matches the description provided by Plaintiff in his letter filed December 1, 2020 (ECF No. 24) had a conversation with Plaintiff about an incident involving forcible touching, and no female employee on Shiloh's payroll in June 2016 matches the description provided by Plaintiff in the same letter.

Accordingly, after undertaking a thorough investigation and making multiple inquiries with Shiloh and DOCCS, we are still unable to identify the individual that Plaintiff sues as “John Doe Parole Officer Williams.” We thank the Court for its consideration in this matter.

Respectfully Submitted,

/s/ Gee Won Cha

Gee Won Cha

Assistant Attorney General

GeeWon.Cha@ag.ny.gov

Christopher D. DeLuca

Christopher D. DeLuca

Senior Counsel

New York City Law Department

Special Federal Litigation Division

cdeluca@law.nyc.gov

cc: Anton Liverpool (Via Mail)